

THOMAS V. CHRISTOPHER
(STATE BAR NO. 185928)
thomas@thomaschristopherlaw.com
THE LAW OFFICES OF THOMAS V.
CHRISTOPHER
415 Mission Street, 37th Floor
San Francisco, CA 94105
Telephone: +1 415 659 1805

Attorney for Plaintiff
3taps, Inc.

ANNETTE L. HURST (STATE BAR NO. 148738)
ahurst@orrick.com
RUSSELL P. COHEN (STATE BAR NO. 213105)
rcohen@orrick.com
NATHAN SHAFFER (STATE BAR NO. 282015)
nshaffer@orrick.com
DANIEL JUSTICE (STATE BAR NO. 291907)
djustice@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
The Orrick Building
405 Howard Street
San Francisco, CA 94105-2669
Telephone: +1 415 773 5700
Facsimile: +1 415 773 5759

Attorneys for Defendant
LinkedIn Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

3taps, Inc.,

Plaintiff,

vs.

LinkedIn Corporation,

Defendant.

Case No. 18-cv-00855-EMC

**STIPULATION AND [PROPOSED]
ORDER REGARDING SCHEDULE
FOR RESPONSE TO SECOND
AMENDED COMPLAINT**

Judge: Hon. Edward M. Chen
Trial Date: None Set
Action Filed: February 8, 2018

1 WHEREAS, Plaintiff 3taps, Inc. (“3taps”) filed a Complaint in the above-captioned action
2 against Defendant LinkedIn Corporation (“LinkedIn”) on February 08, 2018 (ECF No. 1);

3 WHEREAS, after prior motion practice, 3taps filed a Second Amended Complaint
4 (“SAC”), which is the currently operative pleading, on May 12, 2022 (ECF No. 68.01);

5 WHEREAS, on November 15, 2022, after hearing argument on October 27, 2022 (ECF
6 No. 92), the Court denied LinkedIn’s motion to dismiss the SAC (ECF No. 93);

7 WHEREAS, under Federal Rule of Civil Procedure (“Rule”) 12(a)(4)(A), the deadline for
8 LinkedIn to answer the SAC is currently November 29, 2022;

9 WHEREAS, in light of the Thanksgiving holiday and competing obligations for the
10 parties and their counsel, the parties have met and conferred and agreed to extend the deadline for
11 LinkedIn to answer the SAC to December 20, 2022;

12 WHEREAS, LinkedIn anticipates that its response to the SAC will be an Answer;

13 WHEREAS, the parties have further agreed to a schedule that is amenable to both parties
14 if LinkedIn’s response to the SAC is a motion;

15 NOW, THEREFORE, FOR GOOD CAUSE, IT IS HEREBY STIPULATED
16 AND AGREED:

17 1. LinkedIn shall answer or otherwise respond to 3taps’ Second Amended
18 Complaint by December 20, 2022.

19 2. Only if LinkedIn’s response is a motion:

20 a. 3taps shall file its opposition thereto by January 25, 2023.

21 b. LinkedIn shall file its reply by February 8, 2023.

22 c. LinkedIn shall notice the hearing on such motion for March 9, 2023.

23 3. Nothing in this order precludes either party from applying to the Court for
24 relief from any deadline set forth in this stipulation and proposed order.

1 Dated: November 17, 2022

Orrick, Herrington & Sutcliffe LLP

2
3 By: /s/ Annette L. Hurst
4 ANNETTE L. HURST
5 Attorneys for Defendant
6 LinkedIn Corporation
7

8 Dated: November 17, 2022

The Law Offices of Thomas V. Christopher

9
10 By: /s/ Thomas V. Christopher
11 THOMAS V. CHRISTOPHER
12 Attorneys for Plaintiff
13 3taps, Inc.
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Filer's Attestation: I, Annette L. Hurst, am the ECF User whose User ID and password are being used to file this Stipulation. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that I have obtained concurrence in the filing of this document from the above-listed signatories.

By: /s/ Annette L. Hurst
ANNETTE L. HURST

[PROPOSED] ORDER

Pursuant to Stipulation, it is SO ORDERED.

Dated: _____, 2023

THE HONORABLE EDWARD M. CHEN
United States District Judge